

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS STEVEN W. MONTEITH (DFC/USPS-T4-1-12)

May 4, 2021

Pursuant to 39 C.F.R. § 3010.311, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Steven W. Monteith.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Cintron (DFC/USPS-T1-1-15) are incorporated herein by reference.

Respectfully submitted,

Dated: May 4, 2021

DOUGLAS F. CARLSON

DFC/USPS-T4-1. Please refer to your testimony at page 6, lines 8–12. Please provide the basis, including any studies, surveys, market research, focus groups, or other documents, in support of your contention that customer satisfaction may improve after the Postal Service slows delivery times as described in this docket.

DFC/USPS-T4-2. Please refer to your testimony at page 6, lines 8–12. Please provide examples in which a delivery company or postal service improved customer satisfaction by slowing delivery times.

DFC/USPS-T4-3. Please refer to your testimony at page 6, lines 13–22. Please identify changes that the Postal Service made to the proposal described in this docket as a result of feedback received during its “partnership” with customers.

DFC/USPS-T4-4. Please refer to your testimony at page 6, lines 13–22. Please describe how the Postal Service informed individual consumer mailers of the proposal described in this docket and how the Postal Service received and processed feedback from these mailers.

DFC/USPS-T4-5. Please refer to your testimony at page 7, lines 1–5. Please provide studies, surveys, market research, focus groups, or other documents that identify the relative importance of speed versus reliability in customer satisfaction for a delivery company or a postal service.

DFC/USPS-T4-6. Please describe, and provide any documents relating thereto, all customer feedback that the Postal Service has received that supports the proposal described in this docket to slow delivery of First-Class Mail.

DFC/USPS-T4-7. Please refer to your testimony at page 13, lines 7–9 and the market research cited in footnote 49 and that appears in Appendix 1.

- a. Please confirm that the market research indicates that four percent more people assigned importance to consistent delivery of mail when expected than to fast delivery. If you do not confirm, please explain and provide documentation.

- b. Please confirm that the 51 percent of people who cited fast delivery of mail as important potentially could hold a stronger preference for fast delivery than the strength of the preference of the 55 percent of people who cited consistent delivery of mail when expected. If you do not confirm, please explain and provide documentation.
- c. Please confirm that potentially 51 percent of the respondents indicated that they want both consistent delivery of mail when expected and fast delivery. If you do not confirm, please explain and provide documentation.
- d. Suppose that, if given a choice, a majority of customers would prefer faster delivery to slower but more consistent delivery times. Please confirm that the findings of this market research do not disprove this supposition. If you do not confirm, please explain and provide documentation.
- e. Please provide all market research that you believe shows that customers prefer consistent or reliable delivery times over fast delivery times.
- f. Assuming that the respondents to the market research had logical and consistent preferences, please confirm that no data exists to disprove the possibility that, if these respondents had been asked their opinion of the proposal that is the subject of this docket, a majority would have disapproved of it. If you do not confirm, please explain.

DFC/USPS-T4-8. Please refer to your testimony at page 16, lines 16–17 and page 17, lines 1–2.

- a. Do you agree that the finding quoted in your testimony could be a result of customers not knowing the Postal Service’s service standards? If not, please explain.
- b. Do you agree that the finding quoted in your testimony could be a result of customers knowing that their mail should be delivered in, for example,

- three days but that the mail often is delivered late, so they answered the question by stating the number of days by which their mail almost certainly will be delivered, even if late? If not, please explain.
- c. How would you expect a typical individual mailer to know the Postal Service's service standards?
 - d. If most customers already expect their mail to be delivered in seven days, please explain why the proposal described in this docket might increase customer satisfaction.
 - e. For this question, please assume that most customers expect their mail to be delivered in seven days. For mail for which a three-day service standard currently applies, please explain why, hypothetically, delivery of this mail 80 percent of the time in three days and 20 percent of the time in four days might cause less satisfaction compared to delivery 95 percent of the time in four days and five percent of the time in five days.
 - f. For the finding that 71 percent of respondents expected their sent mail to arrive within seven days, please provide all the information concerning this market research or survey that 39 C.F.R. § 3010.323 requires you to provide, including and not limited to the exact question, the exact answer choices, the percentage of respondents who selected each answer choice, and details about the survey sample and methodology. Please also provide the same information listed herein for any related questions in that survey about time to delivery and customers' expectations thereof.

DFC/USPS-T4-9. Please refer to your testimony at page 18, lines 5–11. Do you agree that the concept of reliability encompasses multiple factors in customers' minds, and slowing mail delivery while improving service performance might not cause customers to say that reliability has increased? If you do not agree, please explain and provide documentation.

DFC/USPS-T4-10. Please explain whether the Postal Service's performance in meeting two-day service standards is as high as the Postal Service expected or predicted when it eliminated overnight delivery of single-piece First-Class Mail.

DFC/USPS-T4-11. Please refer to your testimony at pages 24–25. Please provide an example of the type of feedback from customers, including the general public, that might cause the Postal Service not to revise service standards to slow the delivery of First-Class Mail as proposed in this docket.

DFC/USPS-T4-12. Please provide all analyses, studies, market research, and other documents that do not support the conclusions in your testimony concerning the likely preferences or opinions of the general public regarding the proposal described in this docket.